INTERNATIONAL TECHNOLOGY CORPORATION

November 18, 1993

Project No. 816444

Mr. Douglas Beckwith
Project Manager
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155

Reilly Tar Site Excavation Plan

Dear Mr. Beckwith:

The U.S. Environmental Protection Agency (EPA) and IT Corporation (IT) are conducting treatability tests on soil contaminated with polynuclear aromatic hydrocarbons (PAH) at the U.S. EPA Test and Evaluation Facility (T&E Facility) in Cincinnati, Ohio. With your approval, 25 drums of soil excavated from the Reilly Tar Site in St. Louis Park, Minnesota, will be used in these treatability studies. The purpose of this letter is to describe the planned work activities at the Reilly Tar Site so that you may grant approval for soil removal.

Proposed Schedule

Soil from the Reilly Tar Site is scheduled to be excavated between December 5 and December 8, 1994. This soil will be shipped to the T&E Facility in Cincinnati, Ohio, between December 9 and December 16, 1994.

Proposed Excavation Area

The location of the Reilly Tar Site is shown in Figure 1. The site is across the street from the Park Tavern and Bowling Alley located at 3401 South Louisiana Avenue in St. Louis Park, Minnesota. The proposed excavation area is located on the southern portion of the hill which runs along the western boundary of the Reilly Tar Site as shown in Figure 2.

Field Team Members and Responsibilities

Mr. Scott Anderson, Superintendent of Utilities for the City of St. Louis Park, has agreed to provide a backhoe/front-end loader, drum loading equipment, and two operators. His crew has received appropriate 40-hour hazardous waste operations training and will be responsible

Regional Office
1801 Old Highway 8, Suite 124 • St. Paul, Minnesota 55112-2307
612-633-0792 • FAX: 612-633-1596

for excavating soil, stockpiling top soil, placing PAH-contaminated soil into 25 drums, loading drums onto a truck for shipment, and restoring the site. The front end loader will be used for snow removal, as necessary, and site restoration.

Dr. Paul McCauley, Work Assignment Manager for the U.S. EPA T&E Facility in Cincinnati, Ohio, will provide oversite during excavation activities to ensure that soil suitable for treatability testing is collected. Large tar chunks will not be useful in the treatability study, rather, granular contaminated soil is desired.

An IT representative from the St. Paul, Minnesota, office will be on-site during excavation activities to implement the health and safety plan, mark and label drums, and coordinate soil shipment.

Site Background

The Reilly Tar Site was formerly a coal tar refinery and wood treating plant which was operated from 1917 to 1972. Numerous above ground storage tanks located onsite contained creosote oil, pitch, fuel oils, tars, blended treating oils, and gasoline. Soil containing PAH contaminants was moved into the area along the western border of the site and covered with topsoil. This material forms the hill or ridge which runs north-south along the west side of the pond.

Scope of Proposed Work

The purpose of the proposed work at the site is to excavate and obtain a sufficient volume of PAH-contaminated soil to fill 25 drums. The soil will be shipped to the T&E Facility in Cincinnati, Ohio, for biotesting. The excavation will be located in an area of sparse vegetation on top of the hill west of the pond, near the southern end (see Figure 2).

Soil excavation will be performed using a rubber tire backhoe. The overlying topsoil covering will be removed with the backhoe to expose the underlying PAH-contaminated soil. Twenty-five empty drums will be staged onsite near the excavation. Contaminated soil will be excavated, placed into the drums, and the drums will be sealed when full. An attempt will be made during excavation to segregate out construction debris, topsoil, and any large pieces of tar which will not easily fit into the drums. PAH-contaminated soil will be placed into the drums with the backhoe bucket.

Excavation will continue until enough soil has been removed to fill 25 drums. Excess topsoil and other fill material (i.e. construction debris, if present) will be temporarily stockpiled onsite during excavation activities. After sufficient soil has been excavated to fill the drums, the drums will be loaded onto a truck using the backhoe with special drum handling equipment, and positioned on the truck using a drum dolly. The excavation will then be backfilled with the stockpiled soil, and additional fill material will be brought in as needed.

Site restoration will include backfilling and re-contouring excavated areas to grade, replacing topsoil, and re-seeding disturbed areas in the spring. Topsoil erosion during the winter (prior to re-seeding) should be minimal due to the frozen ground surface.

No soil sampling will be performed during the excavation activities. Air monitoring will be performed at regular intervals using a Photoionization Detector (PID), as discussed in Attachment 2 (IT Health and Safety Plan Attachment).

Drum Staging Area

If necessary, labeled drums will be staged in the excavation area and surrounded by a temporary fence marked with barricade tape to indicate no trespassing allowed. If possible, a truck will be on-site during soil excavation so that drummed soil can be placed immediately into the truck for shipment.

Soil Shipment

The U.S. Department of Transportation (DOT) allows shipment of non-acute hazardous material in quantities less than 10,000 kilograms for use in treatability studies using a straight bill of lading (rather than a hazardous waste manifest) as described in 40 CFR Part 261.4. A single drum of soil weighs approximately 300 kilograms. The total weight of the 25 drums of soil will be less than the 10,000 kilogram weight limit. Therefore the drums can be shipped together to the T&E Facility in Cincinnati without a hazardous waste manifest. The trucking company selected for soil shipment is Preston Trucking. They will provide enclosed-bed trucks with drum dollies and drum tie-down capabilities.

Health and Safety

Science Applications International Corporation (SAIC) of Hackensack, New Jersey, recently prepared a site-specific health and safety plan (HSP) for drilling at the Reilly Tar Site bioventing test plots. SAIC's HSP has been amended by IT to include health and safety requirements for excavation and drum handling activities. SAIC's HSP is provided as Attachment 1. Amendments to SAIC's HSP are provided as Attachment 2.

Reporting

A letter report indicating the amount and location of soil removed, excavation dates, on-site personnel, site restoration details, shipping dates, soil receipt dates at the T&E Facility, and any problems encountered will be prepared by IT and submitted for your review and records. The letter report will also be submitted to Mr. Scott Anderson and Dr. Paul McCauley for their records.

Request for Work Approval

Based on this information, the U.S. EPA and IT respectfully request written authorization to remove 25 drums of soil from the Reilly Tar Site between December 5 and December 8, 1994. This approval may be sent to:

Dr. Paul McCauley
U.S. EPA Test and Evaluation Facility
1600 Gest Street
Cincinnati, Ohio 45204

Please do not hesitate to contact either Dr. Paul McCauley at (513) 569-7444 or myself with any questions.

Sincerely,

IT CORPORATION

For Lisa Scheinost
Project Manager

enc.

cc: Dr. Paul McCauley, U.S. EPA (w/o Attachments)
Mr. Scott Anderson, City of St. Louis Park (w/o Attachment 1)
Mr. Roy Haught, IT Corporation (w/o Attachment 1)
Mr. Daryl Owens, U.S. EPA Region V (w/o Attachments)

FIGURE 1
SITE LOCATION

Figure 1

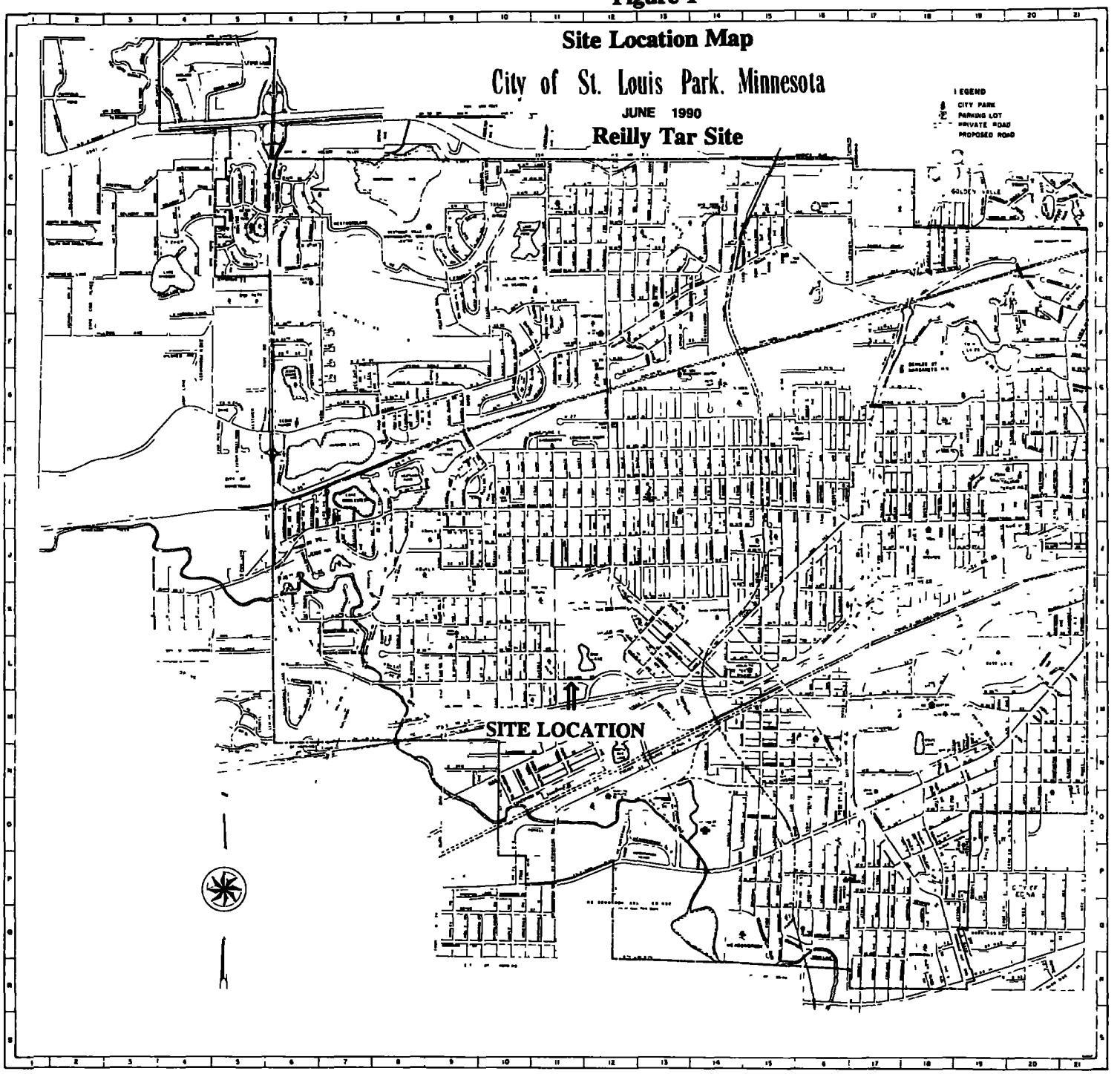
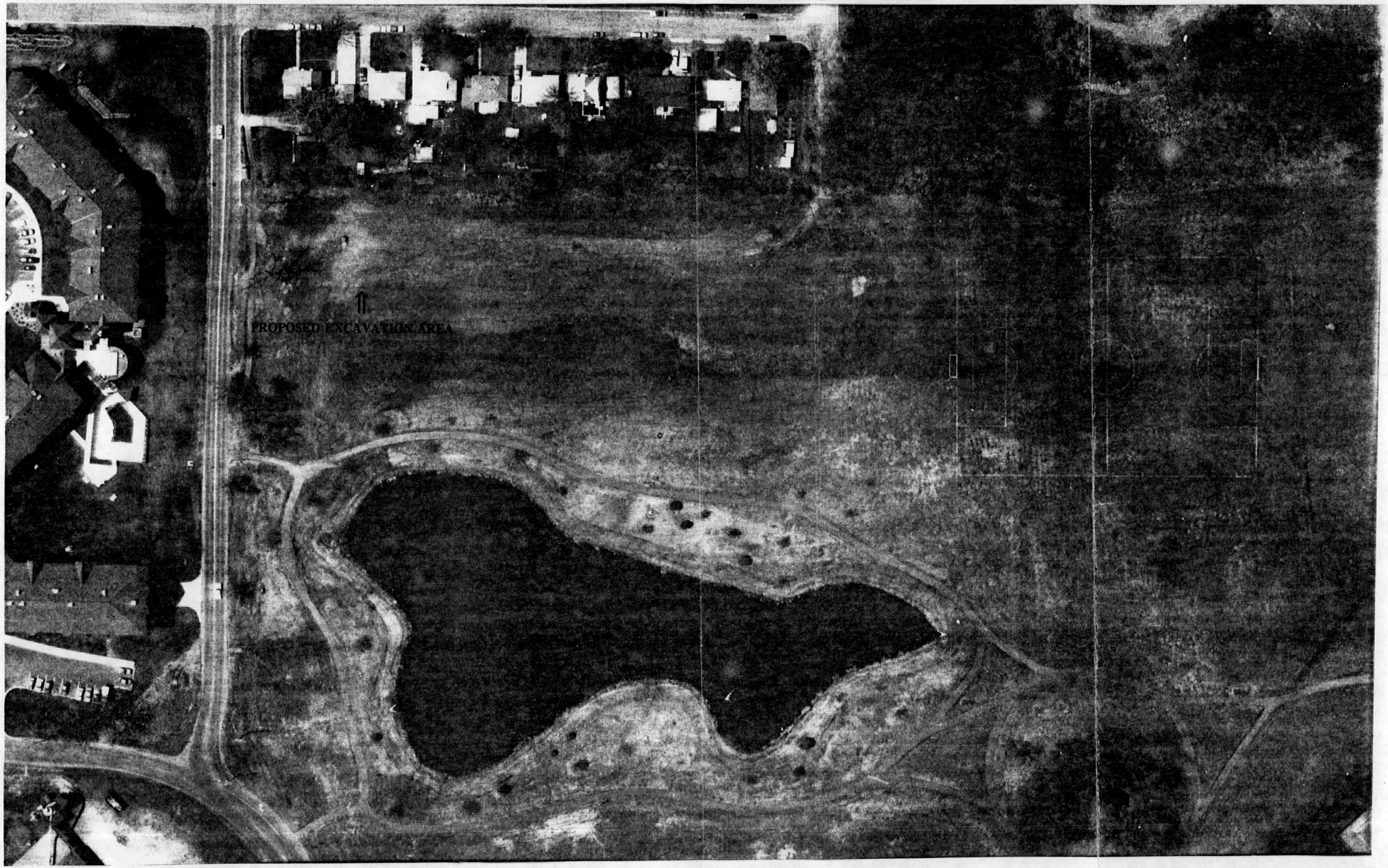


FIGURE 2
PROPOSED EXCAVATION AREA

Figure 2

Excavation Location Map



Reilly Tar Site
St. Louis Park, Minnesota